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FILED
NOV 03 2023
U.S. MAGISTRATE JUDGE
BY _____

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

2:23-MJ- 956 -VCF

9 UNITED STATES OF AMERICA,

Case No.

10 Plaintiff,

CRIMINAL COMPLAINT

11 vs.

VIOLATIONS:

12 HAROLD WESLEY SNOWTEN IV,
a.k.a. "Insane,"

Count One: 18 U.S.C. § 922(o) – Illegal Possession of a Machine Gun

13 Defendant.

Count Two: 18 U.S.C. §§ 922(g)(1) and 924(a)(8) – Prohibited Person in Possession of a Firearm

Count Three: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession of a Controlled Substance with Intent to Distribute (Methamphetamine)

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19 BEFORE the Honorable Cam Ferenbach, United States Magistrate Judge, Las
20 Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:

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COUNT ONE

Illegal Possession of a Machine Gun
18 U.S.C. § 922(o)

On or about April 14, 2023, in the State and Federal District of Nevada,

HAROLD WESLEY SNOWTEN IV,
a.k.a. "Insane,"

the defendant herein, did knowingly possess a machine gun, that is: a machine gun conversion device used to modify a Glock semi-automatic firearm to fire as a fully automatic weapon, specifically a Glock model G29 10mm Auto pistol bearing serial number BWTW196, enabling said firearm to automatically shoot more than one shot, without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TWO

Prohibited Person in Possession of a Firearm
18 U.S.C. §§ 922(g)(1) and 924(a)(8)

On or about April 14, 2023, in the State and Federal District of Nevada,

HAROLD WESLEY SNOWTEN IV,
a.k.a. "Insane,"

defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Unlawful Possession of Cocaine Base for Sale (HS 11351.5), in the Superior Court of California, County of San Diego, on or about August 24, 2013, in Case No. SCD251581, and; Felon in Possession of a Firearm (PC 29800(a)(1)), in the Superior Court of California, County of San Diego, on or about August 24, 2013, in Case No. SCD251581, knowingly possessed firearms, that is: a Glock model G29 10mm Auto pistol bearing serial number BWTW196; a Taurus Armas, S.A./Taurus USA model G2c 9x19mm semiautomatic pistol bearing serial number

1 ABL088621; a MasterPiece Arms model Defender 9x19mm semiautomatic pistol bearing
 2 serial number FX08488; a SCCY Industries model CPX-2 9x19mm semiautomatic pistol
 3 bearing serial number C126578; a Colt's Patent Manufacturing Company, Inc. model 4th
 4 Model Deringer .22 caliber Short derringer bearing serial number 13202DER, and; a Smith
 5 & Wesson model SD9 VE 9x19mm semiautomatic pistol bearing serial number HES7293,
 6 said possession being in and affecting interstate commerce and said firearm having been
 7 shipped and transported in interstate commerce, all in violation of Title 18, United States
 8 Code, Sections 922(g)(1) and 924(a)(8).

9 COUNT THREE

10 Possession of a Controlled Substance with Intent to Distribute (Methamphetamine)
 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

11 On or about April 14, 2023, in the State and Federal District of Nevada,

12 HAROLD WESLEY SNOWTEN IV,
 13 a.k.a. "Insane,"

14 defendant herein, did knowingly and intentionally possess with intent to distribute 50
 15 grams or more of a mixture or substance containing a detectable amount of
 16 methamphetamine, a Schedule II controlled substance, in violation of Title 21, United
 17 States Code, Section 841(a)(1) and (b)(1)(B)(viii).

18 PROBABLE CAUSE AFFIDAVIT

19 1. Your Complainant, Christian Jackson, as a Las Vegas Metropolitan Police
 20 Department ("LVMPD") officer and a Task Force Officer (TFO) with the Bureau of
 21 Alcohol, Tobacco, Firearms, and Explosives (ATF), states the following as and for
 22 probable cause:

23 2. Your Complainant is a Task Force Officer (TFO) with the Bureau of Alcohol,
 24 Tobacco, Firearms and Explosives (ATF). Your Complainant has been employed as a

1 sworn Police Officer with the Las Vegas Metropolitan Police Department (LVMPD) for
2 more than 22 years, from June 2001 through present. Your Affiant has assisted the ATF
3 with the investigation and prosecution of firearms-related cases since February 2017 and
4 was sworn in as an ATF TFO in July 2018.

5 3. Your Complainant has been involved in an investigation which is the
6 subject of this Affidavit. Due to your Complainant's personal participation in this
7 investigation and reports made to your Complainant by other ATF TFOs, ATF Agents
8 and North Las Vegas Police Department ("NLVPD") officers and detectives, your
9 Complainant is familiar with the facts and circumstances surrounding the investigation.
10 Your Complainant's training and experience as a police officer and a TFO, including
11 participation in this investigation, form the basis for opinions and conclusions set forth
12 below. While your Complainant has participated in the below described investigation,
13 your Complainant has not provided every fact known to him within this Complaint.
14 Rather, your Complainant has included only those facts necessary to establish probable
15 cause.

16 FACTS ESTABLISHING PROBABLE CAUSE

17 4. An investigation by the ATF Las Vegas Field Office and the NLVPD has
18 determined that on or about April 14, 2023, Harold Wesley Snowten IV, who uses the
19 street moniker "Insane,"

20 a. illegally possessed a machinegun, that is: a machine gun conversion
21 device used to modify a Glock semi-automatic firearm to fire as a fully automatic weapon,
22 specifically a Glock model G29 10mm Auto pistol bearing serial number BWTW196,
23 enabling said firearm to automatically shoot more than one shot, without manual
24 reloading, by a single function of the trigger;

1 b. knowing he had previously been convicted of a crime punishable by
2 imprisonment for a term exceeding one year, knowingly and illegally possessed six
3 firearms, that is: a Glock model G29 10mm Auto pistol bearing serial number
4 BWTW196; a Taurus Armas, S.A./Taurus USA model G2c 9x19mm semiautomatic
5 pistol bearing serial number ABL088621; a MasterPiece Arms model Defender 9x19mm
6 semiautomatic pistol bearing serial number FX08488; a SCCY Industries model CPX-2
7 9x19mm semiautomatic pistol bearing serial number C126578; a Colt's Patent
8 Manufacturing Company, Inc. model 4th Model Deringer .22 caliber Short derringer
9 bearing serial number 13202DER, and; a Smith & Wesson model SD9 VE 9x19mm
10 semiautomatic pistol bearing serial number HES7293, and;

11 c. knowingly and intentionally possessed with intent to distribute 50
12 grams or more of a mixture or substance containing a detectable amount of
13 methamphetamine, a Schedule II controlled substance.

14 5. In March 2023, North Las Vegas Police Department (NLVPD) officers
15 received information that a man using the street moniker "Insane" was selling
16 methamphetamine, cocaine and firearms out of Apartment 12E of the Emerald Estates,
17 located at 3300 Civic Center Drive in North Las Vegas, Nevada. Officers were able to
18 identify "Insane" as Harold Wesley Snowten IV, a person previously convicted in
19 California of possession of controlled substances for sale, specifically cocaine, and of
20 possession of a firearm after conviction of a felony, among other offenses. NLVPD officers
21 intermittently watched the apartment. Over time, officers saw many different persons
22 approach the apartment, enter, and leave in less than five minutes, a pattern consistent
23 with sales of controlled substances. On one occasion, officers saw what appeared to be a
24 hand-to-hand sale of controlled substances outside the apartment. After two controlled

1 buys of methamphetamine from the apartment and other investigative activities, NLVPD
2 obtained a search warrant for Apartment 12E, 3300 Civic Center Drive in North Las
3 Vegas, Nevada. Among other things, the warrant authorized the search for and seizure of
4 controlled substances, paraphernalia, and firearms.

5 6. On April 14, 2023, NLVPD officers executed the search warrant on
6 Apartment 12E, 3300 Civic Center Drive in North Las Vegas, Nevada. At the time of the
7 execution of the warrant, officers found Snowten and two women inside the apartment.

8 7. Among other items, officers found six firearms, including a machine gun,
9 multiple high-capacity magazines, more than 500 rounds of ammunition in various
10 calibers, ballistic body armor, more than 50 gross grams of methamphetamine, more than
11 10 gross grams of a mixture containing apparent fentanyl, more than 6 gross grams of
12 cocaine, and more than 1,500 gross grams of marijuana, 6 digital scales, large quantities of
13 small baggies, and a stolen motorcycle in the apartment.

14 8. The firearms were:

15 a. a Glock model G29 10mm Auto pistol bearing serial number
16 BWTW196;

17 b. a Taurus Armas, S.A./Taurus USA model G2c 9x19mm
18 semiautomatic pistol bearing serial number ABL088621;

19 c. a MasterPiece Arms model Defender 9x19mm semiautomatic pistol
20 bearing serial number FX08488;

21 d. a SCCY Industries model CPX-2 9x19mm semiautomatic pistol
22 bearing serial number C126578;

23 e. a Colt's Patent Manufacturing Company, Inc. model 4th Model
24 Deringer .22 caliber Short derringer bearing serial number 13202DER, and;

1 f. a Smith & Wesson model SD9 VE 9x19mm semiautomatic pistol
2 bearing serial number HES7293.

3 9. The Glock model G29 10mm Auto pistol bearing serial number BWTW196
4 had been modified with a "Glock switch," a machine gun conversion device. A machine
5 gun conversion device causes a semiautomatic firearm to fire as a fully automatic weapon,
6 that is, it converts a semiautomatic firearm into a machinegun, making the firearm
7 automatically shoot more than one shot, without manual reloading, by a single function of
8 the trigger.

9 10. Through my training and experience, I know that a Glock semiautomatic
10 pistol modified with a machinegun conversion device is an extremely dangerous weapon.
11 A Glock pistol modified with a machinegun conversion device fires at a rate of 1,200
12 rounds per minute, emptying a 15-round magazine in less than one second. Glock pistols,
13 designed to fire single shots, are uncontrollable at such a high rate of fire, spraying rounds
14 indiscriminately. The primary combat rifle of the United States' Armed Forces, the M-4
15 carbine, designed to be selectively fired as a machinegun, only fires at a rate of 700 to 900
16 rounds per minute. Glock pistols modified with machinegun conversion devices present
17 an extreme danger to the public when possessed and used by persons engaged in criminal
18 activity.

19 11. The Glock G29 10mm Auto machinegun had a loaded, 30-round high-
20 capacity SGM Tactical-brand magazine seated in the magazine well. The Taurus G2c
21 9x19mm pistol had a loaded, 17-round high-capacity magazine seated in the magazine
22 well. The MasterPiece Arms Defender 9x19mm pistol had a loaded, 30-round high-
23 capacity magazine seated in the magazine well. The Smith & Wesson SD9 VE 9x19mm
24 pistol had a loaded, 16-round high-capacity magazine seated in the magazine well. The

1 SCCY CPX-2 9x19mm pistol had a loaded, 32-round high-capacity ProMag-brand
2 magazine fitting the CPX-2 nearby. Several other magazines, some loaded, were found
3 with the firearms or elsewhere in the apartment.

4 12. On September 20, 2023, the Las Vegas Metropolitan Police Department
5 (LVMPD) Forensic Lab completed a preliminary National Ballistic Information Network
6 (NIBIN) comparison report regarding the firearms found in the apartment. The
7 examination preliminarily matched the Glock G29 10mm Auto machinegun with four
8 casings recovered in another NLVPD investigation. The examination also preliminarily
9 matched the Taurus G2c 9x19mm pistol to a casing recovered in yet another NLVPD
10 investigation.

11 13. In addition to the ammunition found in the firearms and various magazines,
12 officers found more than 500 other rounds of ammunition in boxes, bags, or loose,
13 including 2 rounds of .308 Winchester, 96 rounds of .223 Remington, 13 rounds of .44
14 Magnum, 86 rounds of .40 S&W, 154 rounds of 9x19mm, and 225 rounds of .22 caliber.

15 14. An ATF Firearms Enforcement Officer verified that each of the six firearms
16 found in the apartment during the search was manufactured outside of the state of
17 Nevada. In order for each of those firearms to be found in Apartment 12E, 3300 Civic
18 Center Drive in North Las Vegas, Nevada, on April 14, 2023, each firearm had to be
19 shipped or transported in interstate or international commerce before that date.

20 15. A review of Snowten's criminal history showed that he had previously been
21 convicted of crimes punishable by imprisonment for a term exceeding one year, including:

22 a. Unlawful Possession of Cocaine Base for Sale (HS 11351.5), in the
23 Superior Court of California, County of San Diego, on or about August 24, 2013, in Case
24 No. SCD251581, and;

1 b. Felon in Possession of a Firearm (PC 29800(a)(1)), in the Superior
2 Court of California, County of San Diego, on or about August 24, 2013, in Case No.
3 SCD251581.

4 16. The records of the above convictions show that Snowten was personally
5 present at his sentencing and that he was advised on the record of the fact that he could no
6 longer lawfully possess firearms as a result of those convictions. Further, Snowten's
7 California conviction for felon in possession of a firearm unquestionably establishes that
8 he knew that he had been convicted of crimes punishable by imprisonment for a term
9 exceeding one year long before April 14, 2023.

10 17. Officers found more than 50 gross grams of methamphetamine in more than
11 one container inside the one-bedroom Apartment 12E of the Emerald Estates on April 14,
12 2023. The two larger portions of methamphetamine were found in a small freezer in the
13 bedroom, occupied by Snowten and the two women at the time of the execution of the
14 search warrant. Later laboratory testing confirmed officers' field identification of the
15 methamphetamine. Based on your Complainant's knowledge, training and experience, 50
16 grams or more of methamphetamine is well beyond an ordinary user-quantity. That
17 amount, more than 50 gross grams, is highly indicative of distribution.

18 18. The methamphetamine, cocaine, presumed fentanyl and marijuana were
19 located throughout the apartment. Officers found and seized four small digital scales of
20 the type commonly used to portion out controlled substances for distribution to users,
21 together with multiple groups of small, unused baggies of the type commonly used to
22 contain portioned-out controlled substances for individual sale. Officers found one glass
23 pipe of the type commonly used to smoke methamphetamine, with a substantial amount
24 of residue. Officers found multiple smoking devices of the types commonly used to smoke

1 marijuana, some with residue. The controlled substances and firearms were intermingled
2 throughout the small apartment, readily accessible.

3 19. On April 14, 2023, after placing Snowten in the rear of a marked patrol
4 vehicle and informing him that he was under arrest for controlled substance offenses, an
5 NLVPD officer read Snowten his *Miranda* rights. Snowten indicated he understood his
6 rights and wished to waive those rights and speak with the officer. In a warned, recorded
7 interview, Snowten told the officer that there were 2 or 3 firearms in the apartment.
8 Snowten admitted that he had been selling methamphetamine from the apartment for
9 about a year. Snowten told the officer that the guns and drugs in the apartment were his.
10 Snowten identified the controlled substances in the apartment as methamphetamine,
11 cocaine, fentanyl and marijuana, describing the major portions of each by appearance and
12 location. Snowten told the officer he had bought the guns and drugs from "a Mexican
13 guy." Snowten denied that the women had any substantial role in any of the criminal acts
14 he discussed with the officer. None of the information officers had previously developed
15 indicated that a woman or women were involved in the sale of controlled substances from
16 the apartment. Both women denied involvement.

17 20. Apartment 12E of the Emerald Estates, located at 3300 Civic Center Drive
18 in North Las Vegas, Nevada, is within the state and Federal District of Nevada.

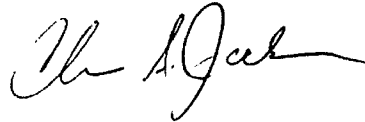
19 21. Snowten was released on bond from state custody in the above offenses on
20 April 17, 2023. Snowten then went into a warrant status, remaining at large until he was
21 re-arrested by state authorities on or about October 9, 2023. Snowten is accused by
22 complaint in the North Las Vegas Township Justice Court of having committed additional
23 offenses while at large, between September 24 and October 9, 2023, including Discharging
24 a Firearm at or into an Occupied Structure (NRS 202.285), Residential Burglary While in

1 Possession of a Deadly Weapon (NRS 205.060), Assault with a Deadly Weapon (NRS
2 200.471) and Robbery (NRS 200.380). Snowten is currently in state custody at the Clark
3 County Detention Center.

4 CONCLUSION

5 22. Based upon the information set forth in this application, your Complainant
6 respectfully submits that there is probable cause to believe that Harold Wesley Snowten
7 IV, a.k.a. "Insane," violated 18 U.S.C. §§ 922(o), Illegal Possession of a Machine Gun,
8 18 U.S.C. §§ 922(g)(1) and 924(a)(8), Prohibited Person in Possession of a Firearm, and
9 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), Possession of a Controlled Substance with Intent to
10 Distribute (Methamphetamine), on April 14, 2023, as described above.

11 Respectfully Submitted,

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13 _____
14 Task Force Officer Christian Jackson
15 Bureau of Alcohol, Tobacco, Firearms
and Explosives

16 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
17 by telephone on November 2, 2023.

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19 _____
20 THE HONORABLE CAM FERENBACH
21 UNITED STATES MAGISTRATE JUDGE
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